

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

OASIS TOOLING, INC., a Delaware Corporation,)	
)	
)	
Plaintiff,)	
v.)	C.A. No. 22-312-CJB
)	
GLOBALFOUNDRIES U.S. INC., a Delaware Corporation,)	
)	
)	
Defendant.)	

**PLAINTIFF OASIS TOOLING, INC.’S MOTION FOR
PARTIAL SUMMARY JUDGMENT AND *DAUBERT* MOTION
TO EXCLUDE MR. MEYER’S DAMAGES OPINIONS**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff Oasis Tooling, Inc. (“Oasis”), hereby moves the Court for partial summary judgment that (1) DRC+ in combination with one of the EDA Tools satisfies the Normalizing Limitation, (2) Defendant GlobalFoundries U.S., Inc.’s (“GF”) export of customer design files to its Singapore affiliate satisfies 35 U.S.C. § 271(f) and is not a defense to direct infringement, (3) the asserted claims are valid over the alleged Texas Instruments’ Disclosures and (4) GF cannot proceed with its government sales defense under 35 U.S.C. § 1498.

Oasis further moves to exclude various opinions of Mr. Paul Meyer pursuant to Fed. R. Evid. 702 and *Daubert v. Merrell Dow Pharma*, 509 U.S. 579 (1993).

The grounds for these motions are fully set forth in Oasis’ omnibus Opening Brief and the supporting Declaration of Aaron M. Frankel, with Exhibits 1 to 40, filed contemporaneously herewith, and upon the papers, records, and pleadings on file with the Court.

Pursuant to D. Del. LR 7.1.1, Oasis certifies that the parties have met and conferred on the subjects of these Motion, but were unable to reach agreement.

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